

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

HELGA GLOCK,

Plaintiff,

v.

GASTON GLOCK SR., *et al.*,

Defendants.

Case No. 1:14-CV-3249-TWT

**PLAINTIFF'S EMERGENCY MOTION TO SEAL
EXHIBIT A TO SECOND DECLARATION OF MICHAEL ENZINGER**

Plaintiff Helga Glock seeks emergency relief to seal Exhibit A to the Second Declaration of Michael Enzinger (ECF No. 63-1) filed in connection with the Reply in Support of Defendants' Motion to Stay Based on International Abstention.

Exhibit A to the Second Declaration of Michael Enzinger ("Exhibit A") is comprised of a document submitted to the court in an Austrian legal proceeding and a translation of that document. The first page of both the German and English version of the documents (ECF No. 63-1, at 9, 19) lists Ms. Glock's home address without redaction. This presents a serious security concern to Ms. Glock. (*See* arguments presented in Plaintiff's Motion to File Documents Under Seal,

ECF No. 33, which are incorporated herein by reference.) This Court has already ordered that documents with the unredacted home addresses of Ms. Glock and Defendants Gaston Glock Sr. and Stephan Doerler should be filed under seal. (ECF No. 40) Moreover, it is a violation of this Court's local rules to file an unredacted home address. (L.R. App'x H, Standing Order in re Electronic Case Filing, Section I.I.1.e.) "A party's privacy or proprietary interest in information sometimes overcomes the interest of the public in accessing the information." *Romero v. Drummond Co.*, 480 F.3d 1234, 1246 (11th Cir. 2007). After the unredacted Exhibit A has been placed under seal, Defendants Glock, Inc., Consultinvest, Inc., Glock (HK) Limited, and Karl Walter can file a redacted version of the document.

In order to minimize any harm to Ms. Glock from the public filing of her home address, she requests that Exhibit A be sealed and removed from the public docket. She further requests permission to file this motion under seal.

Respectfully submitted this 26th day of January 2015.

/s/ John Da Grosa Smith

John Da Grosa Smith
Georgia Bar No. 660946
jdsmith@smithlit.com

Kristina M. Jones
Georgia Bar No. 435145
kjones@smithlit.com

SMITH LLC
1320 Ellsworth Industrial Blvd.
Suite A1000
Atlanta, Georgia 30318
Tel: (404) 605-9680
Fax: (404) 935-5226

Counsel for Plaintiff Helga Glock

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

Pursuant to Local Rule 7.1(D), the undersigned counsel hereby certifies that the foregoing has been prepared in accordance with Local Rule 5.1(C) using 13-point Book Antiqua font.

Dated: January 26, 2015

/s/ John Da Grosa Smith

John Da Grosa Smith
Georgia Bar No. 660946
jdsmith@smithlit.com